

Exhibit 2

Hang Le

From: Amy R. Margolies <amargolies@lynberg.com>
Sent: Monday, October 7, 2024 2:05 PM
To: Hang Le
Cc: Shannon Gustafson; Diana Esquivel; Dale Galipo; Leslie De Leon
Subject: RE: Puga/Botten v. CHP & County of San Bernardino

Hang,

Do you have dates for Plaintiffs' depositions as well? We will need dates for the respective GILs as well as the Botten family.

Thank you,

AMY R. MARGOLIES, ESQ.

Off: (714) 937-1010 Fax: (714) 937-1003



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From: Amy R. Margolies
Sent: Monday, October 7, 2024 1:32 PM
To: Hang Le <hlee@galipolaw.com>
Cc: Shannon Gustafson <sgustafson@lynberg.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Dale Galipo <dalekgalipo@yahoo.com>; Leslie De Leon <ldeleon@galipolaw.com>
Subject: RE: Puga/Botten v. CHP & County of San Bernardino

Hi Hang,

We'll discuss and circulate dates. Was the memo you sent published on their website somewhere? I don't see it.

Thanks,

AMY R. MARGOLIES, ESQ.

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From: Hang Le <hlee@galipolaw.com>

Sent: Monday, October 7, 2024 1:26 PM

To: Amy R. Margolies <amargolies@lynberg.com>

Cc: Shannon Gustafson <sgustafson@lynberg.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Dale Galipo <dalekgalipo@yahoo.com>; Leslie De Leon <ldeleon@galipolaw.com>

Subject: RE: Puga/Botten v. CHP & County of San Bernardino

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Good afternoon Amy & Diana,

I have been informed that the San Bernardino County DA's Office has concluded its investigation and has published its findings. Please see attached for Public Release Memorandum. Please provide me with available deposition dates for your individual clients for the last week of October (10/28-11/1). Thank you.

Best,
Hang

Hang D. Le, Esq. | Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 |
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From: Hang Le

Sent: Monday, October 7, 2024 9:37 AM

To: Amy R. Margolies <amargolies@lynberg.com>

Cc: Shannon Gustafson <sgustafson@lynberg.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Dale Galipo <dalekgalipo@yahoo.com>; Leslie De Leon <ldeleon@galipolaw.com>

Subject: RE: Puga/Botten v. CHP & County of San Bernardino

Hi Amy,

Following up on deposition dates for the officers. Our discovery deadline is coming up quickly and we'd like to get this depositions done as soon as possible so that we can provide the transcripts to our experts. From our conversation a few months back, the County indicated that they expected to wrap up the investigation in June and that was what we represented to the Court. Given that the County is supposed to be wrapping up in the near future, can you please provide some potential dates for depositions later this month and early November? Thank you.

Best,
Hang

Hang D. Le, Esq. | Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: hlee@galipolaw.com

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From: Amy R. Margolies <amargolies@lynberg.com>
Sent: Monday, September 23, 2024 4:20 PM
To: Hang Le <hlee@galipolaw.com>
Cc: Shannon Gustafson <sgustafson@lynberg.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Dale Galipo <dalekgalipo@yahoo.com>; Leslie De Leon <ldeleon@galipolaw.com>
Subject: RE: Puga/Botten v. CHP & County of San Bernardino

Good afternoon Hang,

Apologies I have been out of country since Wednesday. I have inquired from the County as to an expected date and will let you know as soon as I hear back. I would anticipate that based on previous timelines provided, it would be either the end of next week or the end of the following week, but will circle back as soon as I hear.

Thank you,

AMY R. MARGOLIES, ESQ.
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From: Hang Le <hlee@galipolaw.com>

Sent: Wednesday, September 18, 2024 10:17 AM

To: Amy R. Margolies <amargolies@lynberg.com>

Cc: Shannon Gustafson <sgustafson@lynberg.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Dale Galipo <dalekgalipo@yahoo.com>; Leslie De Leon <ldeleon@galipolaw.com>

Subject: Puga/Botten v. CHP & County of San Bernardino

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Good morning Amy,

I am following up on the status of the County DA investigation into this incident and whether we can move forward with setting the officers' depositions. Thank you.

Best,
Hang

Hang D. Le, Esq. | Law Offices of Dale K. Galipo | 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 |
Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: hlee@galipolaw.com

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